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13 *Toshiba America, Inc., Toshiba America*

14 *Information Systems, Inc., and Toshiba*

15 *America Electronic Components, Inc.*

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 (SAN FRANCISCO DIVISION)

15 IN RE: CATHODE RAY TUBE (CRT)
16 ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

18 This Document Relates to
19 Case No. 13-cv-1173-SC (N.D. Cal.)

20 SHARP ELECTRONICS CORPORATION;
21 SHARP ELECTRONICS MANUFACTURING
22 COMPANY OF AMERICA, INC.,

23 Plaintiffs,

24 v.

25 HITACHI, LTD., *et al.*,

26 Defendants.
27
28

**DECLARATION OF LUCIUS B. LAU
IN SUPPORT OF THE TOSHIBA
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO
CIVIL LOCAL RULES 7-11 AND
79-5(d)**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE
TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944 SC
MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follow:

2 1. I am Counsel with the law firm of White & Case LLP, attorneys for
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Information
4 Systems, Inc., and Toshiba America Electronic Components, Inc. (collectively, the "Toshiba
5 Defendants"). I make this declaration in support of the Toshiba Defendants' Administrative
6 Motion to File Documents Under Seal Pursuant to Civil Local Rules 7-11 and 79-5(d), dated
7 January 13, 2014.

8 2. I have personal knowledge of the facts set forth in this declaration and if
9 called upon to do so I could and would testify competently to such matters.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No.
11 306) (the "Stipulated Protective Order").

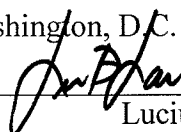
12 4. On December 20, 2013, Plaintiffs Sharp Electronics Corporation and Sharp
13 Electronics Manufacturing Company of America, Inc. served Responses and Objections to
14 Defendants MT Picture Display Co., Ltd. and LG Electronics USA, Inc.'s First Set of
15 Interrogatories (the "Sharp Interrogatory Responses"). These responses are designated as
16 "Confidential" under the Stipulated Protective Order.

17 5. On January 13, 2014, the Toshiba Defendants filed a Motion for Leave to File
18 Supplemental Reply in Support of Their Motion to Dismiss Sharp's Complaint (the "Motion
19 for Leave"); a Supplemental Reply attached as Exhibit A to the Motion for Leave; and the
20 Sharp Interrogatory Responses attached as Exhibit 1 to the Supplemental Reply.

21 6. Portions of the Motion for Leave and the Supplemental Reply contain
22 citations to, and discussions of, material in the Sharp Interrogatory Responses. As such, the
23 Toshiba Defendants filed these documents, with the Sharp Interrogatory Responses, under
24 seal.

25 I declare under penalty of perjury under the laws of the United States of America that
26 the foregoing is true and correct.

27 Executed this 13th day of January, 2014, in Washington, D.C.

28 


Lucius B. Lau

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE
TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944 SC,
MDL No. 1917

CERTIFICATE OF SERVICE

On January 13, 2014, I caused a copy of "DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA DEFENDANTS' ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)" to be electronically filed via the Court's Electronic Case Filing System, which constitutes service in this action pursuant to the Court's order of September 29, 2008.



Lucius B. Lau